

Exhibit C

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LLC; BEST BUY ENTERPRISE SERVICES, INC.;
15 BEST BUY STORES, L.P.; BESTBUY.COM,
L.L.C.; and MAGNOLIA HI-FI, INC.
16

17 **UNITED STATES DISTRICT COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA**
19

20 BEST BUY CO., INC.; BEST BUY
PURCHASING LLC; BEST BUY
21 ENTERPRISE SERVICES, INC.; BEST
BUY STORES, L.P.; BESTBUY.COM,
22 L.L.C.; and MAGNOLIA HI-FI, LLC,

23 Plaintiffs,

24 v.

25 HITACHI, LTD.; HITACHI DISPLAYS,
LTD.; HITACHI AMERICA, LTD.;
26 HITACHI ASIA, LTD.; HITACHI
ELECTRONIC DEVICES (USA), INC.;
27 SHENZHEN SEG HITACHI COLOR
DISPLAY DEVICES, LTD.; IRICO
28 GROUP CORPORATION; IRICO

Case No. Master File No. 3:07-cv-05944-SC

MDL No. 1971

Individual Case No. 3:11-cv-05513-SC

**PLAINTIFFS BEST BUY CO., INC., BEST
BUY PURCHASING LLC, BEST BUY
ENTERPRISE SERVICES, INC., BEST
BUY STORES, L.P., BESTBUY.COM,
L.L.C., AND MAGNOLIA HI-FI, INC.'S
RESPONSES TO DEFENDANTS
CHUNGHWA PICTURE TUBES, LTD.
AND CHUNGHWA PICTURE TUBES
(MALAYSIA) SDN. BHD.'S FIRST SET OF
REQUESTS FOR ADMISSION**

GROUP ELECTRONICS CO., LTD.;
 IRICO DISPLAY DEVICES CO., LTD.;
 LG ELECTRONICS, INC.; LG
 ELECTRONICS USA, INC.; LP
 DISPLAYS INTERNATIONAL LTD.;
 PANASONIC CORPORATION;
 PANASONIC CORPORATION OF
 NORTH AMERICA; MT PICTURE
 DISPLAY CO., LTD.; BEIJING
 MATSUSHITA COLOR CRT CO., LTD.;
 KONINKLIJKE PHILIPS
 ELECTRONICS N.V.; PHILIPS
 ELECTRONICS NORTH AMERICA
 CORPORATION; PHILIPS
 ELECTRONICS INDUSTRIES
 (TAIWAN), LTD.; PHILIPS DA
 AMAZONIA INDUSTRIA
 ELECTRONICA LTDA.; SAMTEL
 COLOR LTD.; THAI CRT CO., LTD.;
 TOSHIBA CORPORATION; TOSHIBA
 AMERICA, INC.; TOSHIBA AMERICA
 CONSUMER PRODUCTS, LLC;
 TOSHIBA AMERICA ELECTRONIC
 COMPONENTS, INC.; TOSHIBA
 AMERICA INFORMATION SYSTEMS,
 INC.; CHUNGHWA PICTURE TUBES,
 LTD.; CHUNGHWA PICTURE TUBES
 (MALAYSIA); Defendants.

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiffs Best Buy Co., Inc.; Best Buy Purchasing LLC; Best Buy Enterprise Services, Inc.; Best Buy Stores, L.P.; BestBuy.Com, L.L.C.; and Magnolia Hi-Fi, Inc. (collectively “Best Buy”) hereby serve Best Buy’s Objections and Responses to Defendant Chunghwa Picture Tubes, LTD. and Chunghwa Picture Tubes (Malaysia) Sdn. Bhd.’s First Set of Requests for Admissions (hereinafter, the “Requests for Admissions”).

RESERVATIONS OF RIGHTS

In responding to these Requests for Admission, Best Buy states that it has conducted, or will conduct, a diligent search, reasonable in scope, for information that is relevant to the Requests for Admission. In the event that additional information relevant to the Requests for Admission is later identified or brought to Best Buy’s attention, Best Buy reserves the right to amend, revise, supplement, modify, or clarify the following objections and responses. Best Buy

1 further reserves the right to complete its investigation and discovery of the facts, and to rely at
2 trial or in other proceedings upon additional information, regardless of whether such information
3 is newly discovered or newly in existence.

4 Best Buy incorporates by reference any evidence identified by the Direct Purchaser
5 Plaintiffs, Indirect Purchaser Plaintiffs, and the other Direct Action Plaintiffs in response to any
6 discovery request.

7 Best Buy has responded to these Requests for Admission as it interprets and understands
8 them. If Defendants subsequently assert an interpretation of any Interrogatory or response that
9 differs from Best Buy's understanding, Best Buy reserves the right to supplement or amend its
10 objections or responses.

11 Best Buy reserves the right to object to the admission of its responses to the Requests for
12 Admission into evidence at trial, or any other proceeding.

13 GENERAL OBJECTIONS

14 1. Best Buy's responses to the Requests for Admission are made without prejudice to Best
15 Buy's right to use or introduce at later times in this proceeding, subsequently discovered
16 information or information omitted from these responses.

17 2. Best Buy objects to the Requests for Admission to the extent they call for the disclosure
18 of information that is subject to the attorney-client privilege, joint prosecution privilege, the work
19 product doctrine, or any other applicable privilege, immunity, or protection.

20 3. Best Buy objects to the Interrogatories to the extent that they require Best Buy to
21 disclose the confidential, proprietary, or commercially sensitive information of third parties that
22 Best Buy is bound, contractually or otherwise, not to disclose.

23 4. Best Buy objects to the Requests for Admission to the extent that they: (i) seek
24 information that is neither relevant to the parties' claims and defenses in this litigation nor
25 reasonably calculated to lead to the discovery of admissible evidence; (ii) are vague, indefinite, or
26 ambiguous; (iii) are unduly burdensome or unreasonably broad; (iv) are unreasonably cumulative
27 or duplicative; or (v) seek information that is already in Defendants' possession, custody, control,
28 or which is publicly available or otherwise readily accessible to Defendants.

1 5. Best Buy objects to the Requests for Admission, including the Instructions and
2 Definitions, to the extent that they purport to impose upon Best Buy obligations beyond those
3 imposed by the Federal Rules of Civil Procedure.

4 6. Best Buy objects to the Requests for Admission to the extent that they are premature.
5 Best Buy has not completed its discovery and investigation in this matter, which is ongoing. Best
6 Buy responds after reasonable inquiry into the relevant facts based only upon presently known
7 information and documentation. Further investigation and discovery, including further review of
8 documents produced or to be produced by Defendants, may result in the identification of
9 additional information. Best Buy's responses should not be construed to prejudice Best Buy's
10 right to conduct further investigation in this case or to limit Best Buy's use of any evidence that
11 may be later developed.

12 7. Best Buy objects to the extent Defendants are drawing a distinction between CRTs and
13 CRT Products. Best Buy interprets all requests related to CRTs to include its purchases of CRT
14 Products, which contain CRTs.

15 8. Best Buy objects to the Requests for Admission to the extent that they prematurely seek
16 expert opinion, and reserves the right to supplement, clarify, revise, or correct any or all responses
17 to such requests, and to assert additional objections or privileges in accordance with the time
18 period for exchanging expert reports.

19 Best Buy objects to the Requests for Admissions in their entirety on the above grounds. In
20 order to avoid repetition, the foregoing General Objections are hereby incorporated into each
21 response as if set forth therein.

22 **RESPONSES**

23 **Request for Admission No. 1:**

24 Admit that You did not purchase any CRT Products from CPT.

25 **Response:**

26 Best Buy refers to and incorporates its General Objections as though set forth fully herein.
27 Best Buy objects to this Request to the extent that it seeks information that has or will be
28 provided through expert discovery.

1 Subject to and without waiving the foregoing objections, Best Buy responds as follows:
2 Upon information and belief, Best Buy purchased finished products containing CRT tubes
3 manufactured by CPT, but admits that it did not purchase CRT Products directly from CPT.

4 **Request for Admission No. 2:**

5 Admit that You did not purchase any CRT Products from CPTM.

6 **Response:**

7 Best Buy refers to and incorporates its General Objections as though set forth fully herein.
8 Best Buy objects to this Request to the extent that it seeks information that has or will be
9 provided through expert discovery.

10 Subject to and without waiving the foregoing objections, Best Buy responds as follows:
11 Upon information and belief, Best Buy purchased finished products containing CRT tubes
12 manufactured by CPTM, but admits that it did not purchase CRT Products directly from CPTM.

13
14 DATED: March 10, 2014

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

15 By: /s/ Laura E. Nelson

16 Roman M. Silberfeld

17 David Martinez

Laura E. Nelson

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21 BEST BUY STORES, L.P.; BESTBUY.COM,
22 L.L.C.; and MAGNOLIA HI-FI, LLC.
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